

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	
	:	
- v. -	:	<u>Protective Order</u>
	:	
	:	S3 11 Cr. 205 (AKH)
CLÍVER ANTONIO ALCALÁ CORDONES,	:	
	:	
Defendant.	:	
	:	
- - - - -	X	

Whereas the United States of America, Damian Williams, United States Attorney for the Southern District of New York, by and through Assistant United States Attorneys Nicholas S. Bradley, Kaylan E. Lasky, and Kevin T. Sullivan, seeks an order restricting the dissemination of material produced pursuant to the Jencks Act, 18 U.S.C. § 3500, and *Giglio v. United States*, 405 U.S. 150 (1972) ("Disclosure Material") in connection with the *Fatico* hearing in this matter scheduled to begin on February 27, 2024 ("Hearing");

Whereas, based on: (i) information in the filings to date related to the defendant Clíver Antonio Alcalá Cordones, which indicates that the Disclosure Material will contain sensitive information, including about assistance to law enforcement by others, including confidential sources and other witnesses who continue to provide assistance in sensitive and ongoing international investigations; and (ii) the consent of the defendant, by and through his attorneys, César de Castro, Esq.,

Valerie Gotlib, Esq., Adam Kaufmann, Esq., and Cristian Francos, Esq., the Court finds that there is good cause for the requested relief;

IT IS HEREBY ORDERED that the defendant and his defense team -- including but not limited to his attorneys, and any U.S.-based paralegals, investigators, and interpreters working for the defendant or his attorneys -- shall not transport or transmit any of the Disclosure Material outside of the United States;


IT IS FURTHER ORDERED that the defendant and his defense team shall not show or disseminate any of the Disclosure Material to anyone other than the defendant and U.S.-based paralegals, investigators, and interpreters working for his attorneys;

IT IS FURTHER ORDERED that the defendant shall not possess any of the Disclosure Material, either before, during, or after the Hearing, except when reviewing the Disclosure Material in the presence of his U.S.-based attorneys or U.S.-based paralegals, investigators, and interpreters working for his attorneys;

IT IS FURTHER ORDERED that the defendant and his defense team shall return to the Government, or destroy, all of the Disclosure Material at the close of the Hearing or when any appeals have become final; and

IT IS FURTHER ORDERED that defense counsel may seek authorization of the Court, with notice to the Government, to provide certain specified materials to persons whose access to such materials is otherwise prohibited by this Order, if it is determined by the Court that such access is necessary for the purpose of preparing the defense of the case.

SO ORDERED:


HONORABLE ALVIN K. HELLERSTEIN
United States District Court
Southern District of New York

Feb. 20, 2024
Date